

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of

Notice of Proposed Rulemaking  
18 FCC Rcd 13187, 13188 ¶1 (2003)

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ET Docket No. 03-137

To: Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

Comment Filed by: Nan Wishner  
504 San Carlos Ave  
Albany CA 94706  
albanycellinfo@gmail.com  
510-524-5185

February 5, 2013

**AFFIDAVIT OF Nan Wishner**

State of California, Alameda County

I, Nan Wishner, attest that my statements are true to the best of my knowledge.

**Comments** for ET Docket No. 03-137.

1. My name is Nan Wishner. My address is 504 San Carlos Ave., Albany CA 94706.
2. I am a technical writer and editor and one of the founders of Albany Residents for Responsible Oversight of Wireless (ARROW).
3. I urge the FCC to alter its standards for radio frequency (RF) radiation exposure so that the standards are not just based on the risk of tissue heating from exposure but are also based on understanding of biological mechanisms by which RF radiation can alter and damage cells that have been identified in research done since the current standards were adopted. Furthermore, the standards should explicitly take into account differences in the size and vulnerability of different human receptors. For example, children's skulls are smaller and their tissues and organs are developing at a rapid rate compared to those of adults; therefore, RF exposure safety standards for children should be far more restrictive than those for mature adults. Similarly, exposure standards for women should not be based on the model of large adult males. A thorough scientific review of the current, independent scientific literature is critical as a basis for establishing up-to-date standards that will better protect the public from harm. Studies done or funded by wireless device manufacturers should not be relied upon in developing the new standards.

Respectfully submitted by

Nan Wishner  
504 San Carlos Ave.  
Albany CA 94706  
February 5, 2013